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January 24, 2022

VIA ECF

Hon. Mark W. Pedersen
United States Magistrate Judge
2720 U.S. Courthouse
100 State Street, Rochester, NY 14614

Re: *Vann v. City of Rochester et al*,
18-cv-6464 (EAW)(MJP)

Dear Judge Pedersen,

I represent the Plaintiff, David Vann, in the above matter. I write to respectfully submit a joint request with Defendants for a six-month extension of all deadlines in the July 29, 2021 Scheduling Order (Doc. No. 65). This is the parties second request for a discovery extension.

Fact Discovery to be completed by August 3, 2022. Plaintiff Expert ID due by August 14, 2022. Defendant Expert ID due by September 14, 2022. Expert Discovery to be completed by October 22, 2022. Dispositive Motions due by November 9, 2022.

The parties have been working cooperatively and have conducted significant document discovery. The parties have been delayed in conducting document discovery, which is not yet complete, due to the COVID-19 pandemic and other

pressing matter. However, the parties are ready to begin conducting depositions, and have agreed to conduct same via videoconference.

Thank you for your consideration of this joint request. If the Court requires any further information, please do not hesitate to have one of your clerks contact me. If this meets with the Court's approval, I have attached a proposed amended scheduling order hereto as Exhibit "A".

Respectfully Submitted,

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Elliot Dolby Shields